

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

<b>UNITED STATES OF AMERICA,</b>	)	
	)	<b>CRIMINAL NO. 3:14-CR-00012</b>
<b>v.</b>	)	
	)	<b>JUDGE JAMES R. SPENCER</b>
<b>ROBERT F. MCDONNELL</b>	)	
<b>MAUREEN G. MCDONNELL</b>	)	

**DEFENDANT ROBERT F. MCDONNELL'S PROPOSED  
SUPPLEMENTAL QUESTIONS FOR VOIR DIRE**

Defendant Robert F. McDonnell, through counsel, hereby requests the Court ask potential jurors the following questions at voir dire, in addition to those the Court has prepared:

- Since the time you signed your questionnaire, do you have any updates or corrections?
- Since the time you signed your questionnaire, have you been exposed to any additional media about this case?
- Have you discussed your potential jury service with anyone?
- Do you know any other potential jurors in this case?

Additionally, Mr. McDonnell requests the Court ask potential jurors the following questions during the portion of voir dire held *in camera* at the bench:

- Other than civic duty, do you have any special reason for wishing to serve on this jury?
- (For potential jurors who returned their questionnaires late:) Why did you send your questionnaire in late?

Finally, Mr. McDonnell requests the Court ask (publicly or *in camera*, as appropriate) potential jurors the questions that were previously proposed in the parties' joint questionnaire or his supplementary questionnaire but omitted from the juror questionnaire as circulated.

Dated: July 25, 2014

Respectfully submitted,

/s/ Jonathan A. Berry

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**CERTIFICATE OF SERVICE**

I, Jonathan A. Berry, am a member of the Bar of this Court. I hereby certify that on this 25th day of July, 2014, I caused the foregoing to be electronically filed with the Clerk of Court using the CM/ECF system, causing it to be served on all registered users.

Dated: July 25, 2014

Respectfully submitted,

/s/ Jonathan A. Berry

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